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**DIVISION OF WATER QUALITY PROGRAMS**  
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**SUBJECT:** Guidance Memo No. 05-2010  
CEDS Data Entry Rules

**TO:** Regional Directors

**FROM:** Ellen Gilinsky, Ph.D., Director 

**DATE:** June 24, 2005

**COPIES:** Water Permit Managers, Enforcement/Compliance Managers, Allan Brockenbrough, Bill Purcell, Susan Tragesser, Joanne Lam, Lily Choi, George Cosby

**Summary:**

The purpose of this guidance is to describe the correct CEDS data entry rules for some of the fields where improper entries have caused PCS data rejections, errors and false violations, and to ensure that CEDS contains accurate information that will enable an eDMR system to work.

**Electronic Copy:**

An electronic copy of this guidance in PDF format is available for staff internally on DEQNET and for the general public on DEQ's website at: <http://www.deq.virginia.gov>

**Contact information:**

Please contact Mike Gregory, (804) 698-4065, [mbgregory@deq.virginia.gov](mailto:mbgregory@deq.virginia.gov) or Susan Tragesser, (804) 698-4203, [satragesser@deq.virginia.gov](mailto:satragesser@deq.virginia.gov) if you have any questions about this guidance.

**Disclaimer:**

**This document is provided as guidance and, as such, sets forth standard operating procedures for the agency. However, it does not mandate any particular method nor does it prohibit any particular method for the analysis of data, establishment of a wasteload allocation, or establishment of a permit limit. If alternative proposals are made, such proposals should be reviewed and accepted or denied based on their technical adequacy and compliance with appropriate laws and regulations.**

# CEDS Data Entry Rules

## ***Background:***

DEQ is continuing to move forward with electronic formats for permit documents and information transfers, including VPDES electronic Discharge Monitoring Report (eDMR) submittals which are likely to be working by November, 2005. Because of this it has become even more important to enter information properly into CEDS to maintain the integrity of the database and to ensure proper and accurate uploading of our VPDES reporting information to EPA's database (PCS now, ICIS later). The databases work together as long as certain key data entry rules are followed.

Below are listed some of the current data entry problem areas, most of which were addressed in an October 30, 2002 memo from Dale Phillips, but with which we are still encountering problems. Data entry rules are listed with them. These rules must be followed in order for the eDMR project to work correctly, so please begin to implement them immediately as you make new entries. For existing data, minor permit data should be reviewed and corrected as necessary prior to an approval of eDMR participation, but **please do not go back and make any changes to the limits table for active major permits.** Major permits will have to be corrected on a case by case basis with assistance from the Central Office.

Where possible and as time allows, software changes will be made that will automate entries or entry choices to further reduce entry errors.

A section will be added to the VPDES permit manual to identify CEDS data entry problems and solutions as the problems are encountered in the future. If anyone finds problem areas that are not addressed below please pass them on to Mike Gregory or Susan Tragesser.

## ***Problem Areas and Rules***

### **Problem: Monitor start date.**

**Discussion:** When there are combinations of interim, final and enforcement limits, the MONITORING START DATE and 1ST DMR DUE DATE should not change for the different limit sets. The correct limit will be selected based on the limit start and end date. (In several years CEDS will be modified such that this is not an issue.) Example:

Parameter number	Parameter name	Type	Limit Start date	Limit End Date	Monitor Start Date	First DMR due date	Reporting Frequency
039	Ammonia	Interim	2/18/05	2/17/08	3/1/05	4/10/05	Monthly
039	Ammonia	Final	2/18/08	2/17/10	3/1/05	4/10/05	Monthly
039	Ammonia	Enforcement	9/15/08	3/31/09	3/1/05	4/10/05	Monthly

**Rule 1:** Enter the same MONITORING START DATE and same 1ST DMR DUE DATE for interim, final and enforcement limits.

**Problem: Monitor start date and first DMR due date.**

**Discussion:** The MONITOR START DATE must always be the first day of a month, and it must occur after the effective date of the permit. Also, the MONITORING START DATE and the 1ST DMR DUE DATE must be separated by a monitoring period plus 10 days. For monthly monitoring the MONITORING START DATE will be the first of the month following the permit effective date, and the 1ST DMR DUE DATE will be the 10<sup>th</sup> of the month that follows. For non-monthly monitoring, the MONITORING START DATE must be after the effective date and must be the first of the month that begins the monitoring period for which a DMR is expected. CEDS, PCS and ICIS do not require that quarterly, semiannual or annual monitoring periods begin and end on any specified calendar based months, and if the region wishes to avoid gaps in reporting it is acceptable to simply let CEDS determine the non-monthly monitoring periods by setting the MONITORING START DATE to the first of the month following the permit effective date as for monthly monitoring, and then the quarterly, semiannual or annual monitoring period begins with that month, with the 1ST DMR DUE DATE set at the 10<sup>th</sup> of the month following that monitoring period. Monitoring periods and first DMR due dates should be clearly specified in the permit.

Set calendar month monitoring periods for non-monthly reporting (e.g., Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec for quarterly) may be preferred for convenience, ease of tracking or in some cases may be required. In this case do not set the MONITORING START DATE to the first of the month following the effective date unless it is a month that begins your calendar quarter. Move the MONITORING START DATE forward in time to the first of the month that begins your next calendar monitoring period, with the 1ST DMR DUE DATE on the 10<sup>th</sup> of the month following the first calendar monitoring period. In other words, the MONITORING START DATE and 1ST DMR DUE DATE are separated by a monitoring period plus 10 days. Otherwise, you may not be expecting a DMR but PCS or ICIS will, and a non-reporting violation will occur.

Note that forcing the system to calendar month quarterly, semiannual and annual monitoring periods will cause gaps in reporting. In the case of annual reporting at least, depending on the dates, these non-reporting periods can be substantial and will reoccur at every reissuance. If more data AND calendar reporting is desired, consideration might be given to an increased reporting frequency or to requiring an additional, untracked (not required by CEDS) DMR . Note that once the eDMR system is in place, skeleton DMRs will be created for all facilities (whether participating in eDMR or not) at the appropriate periods and non-reporting facilities will be detected by CEDS, so for tracking purposes at least, there may be less reason in the future to adhere to calendar reporting. In any case, either method of determining non-monthly reporting periods will work with CEDS, PCS and ICIS as long as the entry rules are followed as specified below.

Examples:

Establishing monitoring periods and due dates based on permit effective date:

Permit effective date	Monitor start date	Reporting Frequency	1 <sup>st</sup> DMR due date	Monitoring period example
2/18/2005	3/1/05	Monthly	4/10/05	3/1/05 – 3/31/05
2/18/2005	3/1/05	Once every two months	5/10/05	3/1/05 – 4/30/05
2/18/2005	3/1/05	Quarterly	6/10/05	3/1/05 – 5/31/05
2/18/2005	3/1/05	Semi-Annual	9/10/05	3/1/05 – 8/31/05
2/18/2005	3/1/05	Annual	3/10/06	3/1/05 – 2/28/06

Establishing monitoring periods and due dates based on calendar reporting:

Permit effective date	Monitor start date	Reporting frequency	1 <sup>st</sup> DMR due date	Monitoring period example
2/18/05	3/1/05	Monthly	4/10/05	3/1/05 – 3/31/05
2/18/05	3/1/05	Once every two months	5/10/05	3/1/05 – 4/30/05
2/18/05	4/1/05	Quarterly	7/10/05	4/1/05 – 6/30/05
2/18/05	7/1/05	Semi-annual	1/10/06	7/1/05 – 12/31/05
2/18/05	1/1/06	Annual	1/10/07	1/1/06 – 12/31/06

**Rule 2:** The **MONITORING START DATE** must be after the effective date, must be the first day of the month, and must be the first day that begins a monitoring period for which reporting is required.

**Rule 3:** The 1<sup>ST</sup> **DMR DUE DATE** must be separated from the **MONITORING START DATE** by a monitoring period plus 10 days.

**Problem: Parameter limit start date and end date.**

**Discussion:** The LIMIT START DATE should be greater than or equal to the effective date of the permit. Also, do not allow gaps or overlaps between permit interim and final limit date ranges. Enforcement action limit start and end dates can overlap permit limit date ranges, but they should not replace final limits (i.e., do not delete final permit limits). Final limits are always required. Note: In the permit limit screen, enforcement action limits are identified as modifications.

**Rule 4:** The **LIMIT START DATE** must be greater than or equal to the effective date.

**Rule 5:** There must be no time gaps or overlaps between interim and final limit date ranges.

**Rule 6:** Final limits are always required.

**Problem: Inactive pipes and facilities not constructed.**

**Discussion:** If for some reason a pipe becomes inactive during the life of a permit, a date should be keyed into the field on the permitting outfall information screen entitled “DATE PIPE WENT OFFLINE.” This will deactivate the pipe in PCS.

When a permit is issued but the facility is not constructed and a DMR is not required until the issuance of the CTO, the effective date of the permit should be keyed into the same “DATE PIPE WENT OFFLINE” field described above. Once the CTO is issued, the date should be removed and notification should be made to Joanne Lam ( [jjlam@deq.virginia.gov](mailto:jjlam@deq.virginia.gov) ) so that the pipe can be activated in PCS.

For the present, it will be necessary for eDMR submitting facilities to continue to submit a “no discharge” DMR for the inactive outfall.

**Rule 7:** A date must be keyed into “DATE PIPE WENT OFFLINE” if an outfall goes offline or if a DMR is not yet required for that outfall. The date should be removed if the pipe becomes active.

**Problem: Tier numbers.**

**Discussion:** For parameters that are **not** seasonal the tier number should always be “0”. For encoding more than one seasonal limit value for a parameter, a tier number of “1” should be used for the first season, a tier number of “2” should be used for the second season, etc.

**Rule 8:** Tier number assignment must be “0” for non-seasonal parameters only. If there is more than one seasonal limit value per parameter begin with “1” for the first season.

**Problem: Monthly check boxes.**

**Discussion:** The monthly check boxes are used to indicate seasonal parameters only. All the monthly check boxes should be flagged, whether there is monthly or non-monthly reporting, unless there are seasonal parameters. For seasonal parameters the check boxes should be flagged based on the appropriate monitoring months.

**Rule 9:** Check all the monthly check boxes regardless of reporting frequency unless the limit is seasonal.

**Problem: Compliance Schedule Events.**

**Discussion:** It is important to ensure that the compliance schedule event information is accurate and up-to-date. Compliance schedule events will be available to permittees in the eDMR system to help them track and meet these permit requirements.

The following rules are provided to avoid confusion over the meaning of compliance schedule events. The logic behind point assignment based on these dates is as follows:

- 1) If the event is past due and there is no received date, points will be applied by CEDS for an unfulfilled event.
- 2) If the received and reviewed dates are entered and the complete date is blank, CEDS will assign the appropriate points for an incomplete or inadequate submittal.

**Rule 10:** DATE RECEIVED = the date that a compliance schedule requirement is received or met but not necessarily completed.

**Rule 11:** DATE COMPLETED = date event is complete (all requirements met - may be the same as date received).

**Rule 12:** DATE REVIEWED = date reviewed by appropriate DEQ staff.

**Problem: Administratively continued permits.**

**Discussion:** The permit writer should flag the "ADMINISTRATIVELY CONTINUED" check box in the general information screen for any permit that has been administratively continued. This will allow compliance to continue tracking, keying, and evaluating DMR data for facilities that have been administratively continued.

**Rule 13:** Flag the “ADMINISTRATIVELY CONTINUED” box in the general information screen when permits are continued.

**Problem: Representative outfalls.**

**Discussion:** When a permit containing representative outfalls (not all outfalls are actually sampled) is issued, reissued, or modified the permit writer should make a notation in the "comments" section of the DMR indicating which outfalls that particular DMR represents. The compliance auditor will ensure that the reported data on this DMR is entered into CEDS for each applicable outfall as noted in the comments.

**Rule 14:** When representative outfalls are allowed note in the DMR comments section which outfalls are being sampled.

**Problem: GIS Information.**

**Discussion:** GIS information (latitude/longitude) is needed at the facility level as well as at the outfall level.

**Rule 15:** GIS information should be added under the GIS tab on the CEDS facility screen as well as on the outfall screen.

**Problem: Permit Effective Date.**

**Discussion:** We are encountering some instances in CEDS where the PERMIT EFFECTIVE DATE is being changed in the events table when a permit is modified. The PERMIT EFFECTIVE DATE should remain the same and the DATE SIGNED should be updated when a modification takes place.

**Rule 16:** When a permit is modified, update the DATE SIGNED event but do not change the DATE EFFECTIVE event in the events table.

***SUMMARY:***

**Rule 1:** Enter the same MONITORING START DATE and same 1ST DMR DUE DATE for interim, final and enforcement limits.

**Rule 2:** The MONITORING START DATE must be after the effective date, must be the first day of the month, and must be the first day that begins a monitoring period for which reporting is required.

**Rule 3:** The 1<sup>ST</sup> DMR DUE DATE must be separated from the MONITORING START DATE by a monitoring period plus 10 days.

**Rule 4:** The LIMIT START DATE must be greater than or equal to the effective date.

**Rule 5:** There must be no time gaps or overlaps between interim and final limit date ranges.

**Rule 6:** Final limits are always required.

**Rule 7:** A date must be keyed into “DATE PIPE WENT OFFLINE” if an outfall goes offline or if a DMR is not yet required for that outfall. The date should be removed if the pipe becomes active.

**Rule 8:** Tier number assignment must be “0” for non-seasonal parameters. If there is more than one seasonal limit value per parameter begin with “1” for the first season.

**Rule 9:** Check all the monthly check boxes regardless of reporting frequency unless there are seasonal parameters.

**Rule 10:** In compliance schedule events, DATE RECEIVED = the date that a compliance schedule requirement is received or met but not necessarily completed.

**Rule 11:** In compliance schedule events, DATE COMPLETED = date event is complete (all requirements met - may be the same as date received).

**Rule 12:** In compliance schedule events, DATE REVIEWED = date reviewed by appropriate DEQ staff.

**Rule 13:** Flag the “ADMINISTRATIVELY CONTINUED” box in the general information screen when permits are continued.

**Rule 14:** When representative outfalls are allowed note in the DMR comments section which outfalls are being sampled.

**Rule 15:** GIS information should be added under the GIS tab on the CEDS facility screen as well as on the outfall screen.

**Rule 16:** When a permit is modified, update the DATE SIGNED event but do not change the DATE EFFECTIVE event in the events table.